

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

-----X  
CAROLYN GREENE, on Behalf of Herself and  
All Others Similarly Situated,

Plaintiff,

vs.

BIOPURE CORPORATION, THOMAS A. MOORE,  
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.  
-----X

Civ. No. 1:03 CV 12628 (NG)

[Additional Captions Set Forth Below]

**DECLARATION OF BRADLEY DYER IN SUPPORT OF THE MOTION OF RONALD  
ERICKSON AND BENJAMIN JOSEPH FOR CONSOLIDATION, APPOINTMENT AS  
LEAD PLAINTIFFS PURSUANT TO §21D(a)(3)(B) OF THE SECURITIES EXCHANGE  
ACT OF 1934 AND APPROVAL OF SELECTION OF LEAD COUNSEL**

-----X  
JOHN G. ESPOSITO, JR., on Behalf of Himself and  
All Others Similarly Situated,

Plaintiff,

vs.

BIOPURE CORPORATION, THOMAS A. MOORE,  
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.  
-----X

Civ. No. 1:04 CV 10013 (NG)

JOSEPH L. KING, on Behalf of Himself and  
All Others Similarly Situated,

Plaintiff,

vs.

BIOPURE CORPORATION, THOMAS A. MOORE,  
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.  
-----X

Civ. No. 1:04 CV 10038 (NG)

MICHAEL E. CRIDEN, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiff,

vs.

BIOPURE CORPORATION, THOMAS A. MOORE  
and CARL W. RAUSCH,

Defendants.  
-----X

Civ. No. 1:04 CV 10046 (NG)

-----X  
ISRAEL SHURKIN and SHARON SHURKIN,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiffs,

vs.

BIOPURE CORPORATION, THOMAS A. MOORE  
and CARL W. RAUSCH,

Defendants.  
-----X

JAMES J. NIZZO, VIRGINIA C. NIZZO and  
CARLO CILIBERTI, on Behalf of Themselves  
and All Others Similarly Situated,

Plaintiffs,

vs.

BIOPURE CORPORATION, THOMAS A. MOORE,  
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.  
-----X

BARRY BROOKS, on Behalf of Himself and  
All Others Similarly Situated,

Plaintiff,

vs.

BIOPURE CORPORATION, THOMAS A. MOORE,  
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.  
-----X

Civ. No. 1:04 CV 10055 (NG)

Civ. No. 1:04 CV 10065 (NG)

Civ. No. 1:04 CV 10077 (NG)

-----X  
ANASTASIOS PERLEGIS, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

Civ. No. 1:04 CV 10078 (NG)

vs.

BIOPURE CORPORATION, THOMAS A. MOORE,  
THOMAS A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,

Defendants.  
-----X

MARTIN WEBER, on Behalf of Himself and All  
Others Similarly Situated,

Plaintiffs,

Civ. No. 1:04 CV 10090 (NG)

vs.

BIOPURE CORPORATION, THOMAS A. MOORE,  
THOMAS A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,

Defendants.  
-----X

BRUCE HAIMS, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiffs,

Civ. No. 1:04 CV 10144 (NG)

vs.

BIOPURE CORPORATION, THOMAS A. MOORE,  
THOMAS A. MOORE, CARL W. RAUSCH and  
RONALD F. RICHARDS,

Defendants.  
-----X

-----X  
MODEL PARTNERS LIMITED, Individually and :  
on Behalf of All Others Similarly Situated, :

Plaintiff, :

Civ. No. 1:04 CV 10155 (NG)

vs. :

BIOPURE CORPORATION, THOMAS A. :  
MOORE, CARL W. RAUSCH and RONALD :  
F. RICHARDS, :

Defendants. :  
-----X

JUNE E. PATENAUDE, Individually and on Behalf :  
of All Others Similarly Situated, :

Plaintiff, :

Civ. No. 1:04 CV 10179 (NG)

vs. :

BIOPURE CORPORATION, THOMAS A. :  
MOORE, CARL W. RAUSCH and RONALD :  
F. RICHARDS, :

Defendants. :  
-----X

NANCY L. PINCKNEY, and GERTRUDE :  
PINCKNEY, Individually and on Behalf of All :  
Others Similarly Situated, :

Plaintiff, :

Civ. No. 1:04 CV 10189 (NG)

vs. :

BIOPURE CORPORATION, THOMAS A. :  
MOORE, CARL W. RAUSCH, :

Defendants. :  
-----X

-----X  
W. KENNETH JOHNSON, on Behalf of Himself :  
and All Others Similarly Situated, :

Plaintiff, :

vs. :

BIOPURE CORPORATION, THOMAS A. :  
MOORE, CARL W. RAUSCH and RONALD :  
F. RICHARDS, :

Defendants. :

Civ. No. 1:04 CV 10190 (NG)

-----X  
GREGORY KRUSZKA, on Behalf of Himself :  
and All Others Similarly Situated, :

Plaintiff, :

BIOPURE CORPORATION, THOMAS A. :  
MOORE, CARL W. RAUSCH and RONALD :  
F. RICHARDS, :

Defendants. :

Civ. No. 1:04 CV 10202 (NG)

-----X

I, Bradley P. Dyer, hereby declare:

1. I am an attorney at the law firm of Stull, Stull & Brody. I submit this Declaration in support of the motion of Ronald Erickson and Benjamin Joseph for consolidation, appointment as lead plaintiffs and approval of selection of Stull, Stull & Brody as lead counsel.

2. Attached hereto as Exhibit A is a true and correct copy of the notice of pendency published over PR Newswire, a national, business-oriented news wire service, on December 30, 2003.

3. Attached hereto as Exhibit B are true and correct copies of the plaintiff certifications executed by Ronald Erickson and Benjamin Joseph, which demonstrate their class standing and requisite financial interest in the outcome of the litigation.

4. Attached hereto as Exhibit C is a chart summarizing the transactions of Ronald Erickson and Benjamin Joseph in Biopure Corporation common stock during the Class Period.

5. Attached hereto as Exhibit D is a true and correct copy of Stull, Stull & Brody's firm biography.

6. Attached hereto as Exhibit E is a true and correct copy of Gilman & Pastor, LLP's firm biography.

Signed under penalties of perjury this 1st day of March, 2004.

  
Bradley P. Dyer